

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DEREK TUCSON, ROBIN SNYDER,
MONSIEREE DE CASTRO, and ERIK
MOYA-DELGADO,

Plaintiffs,

v.

CITY OF SEATTLE, ALEXANDER
PATTON, TRAVIS JORDAN, DYLAN
NELSON, JOHN DOES (#1-4), and JANE
DOES (#1-2)

Defendants.

No. 2:23-cv-00017-MJP

DECLARATION OF ROBIN SNYDER IN
SUPPORT ON MOTION FOR
PRELIMINARY INJUNCTION

I, Robin Snyder, declare:

1. I am over the age of 18 and am competent to testify. I am a Plaintiff in the above captioned matter. I have personal knowledge of the following.
2. On January 1, 2021, the defendants arrested me for writing in charcoal on the barrier obstructing the sidewalk outside of the East Precinct building. The messages I wrote were peaceful responses to police misconduct including the arrest of Derek Tucson for similar marking moments earlier. I believe writing these messages was part of my First Amendment right to express myself and protest excessive force, and to remember victims of police misconduct. The audience for my message was both the public and the police.

DECLARATION OF ROBIN SNYDER IN SUPPORT ON
MOTION FOR PRELIMINARY INJUNCTION - 1

No. 2:23-cv-00017-MJP

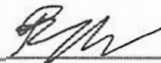
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705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

1 My writing being visible to the police specifically was part of the message I wanted to
2 communicate.

- 3 3. Prior to the arrest, I had done a lot of political chalking similar to that which led to the
4 arrest, in addition to the use of chalk to create art on sidewalks in public parks.
- 5 4. After the arrest, I have definitely been aware that I could be arrested for writing
6 or drawing with chalk, especially if the message is one that is critical of police or in
7 disagreement with any present officers' political views. I regularly attend vigils for
8 victims of police misconduct and continue to engage in more limited chalking, only out
9 of the sight of police, and I still fear that I will be arrested for this activity. I believe I
10 would be arrested again if I engaged in the type of chalking from January 1, 2021 in the
11 presence of police.
- 12 5. If the law that police used to arrest me were held unconstitutional and the City was
13 prohibited from arresting or retaliating against me for chalking in the future, I would
14 likely resume chalking as I did before the arrest. I would no longer be afraid of chalking
15 messages critical of police in their presence and would resume doing so.
- 16 6. In response to this lawsuit, I understand the City recently amended the ordinance I was
17 arrested under. I have reviewed the language of the amended ordinance, which does not
18 alleviate my fear of arrest for chalking.

19
20 I declare under penalty of perjury of the laws of the United States of America that the
21 foregoing is true and correct.

22 DATED this 21 day of March, 2023, at Seattle, Washington.

23
24 

25 Robin Snyder (Mar 21, 2023 11:33 PDT)

26 Robin Snyder
27

DECLARATION OF ROBIN SNYDER IN SUPPORT ON
MOTION FOR PRELIMINARY INJUNCTION - 2

No. 2:23-cv-00017-MJP

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals:

Attorneys for Defendants

Ann Davison
Seattle City Attorney

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Seattle City Attorney's Office
701 Fifth Avenue, Suite 2050
Seattle, WA 98104

DATED this 23rd day of March, 2023, at Seattle, Washington.

s/ Lucas Wildner
Lucas Wildner, Legal Assistant

DECLARATION OF ROBIN SNYDER IN SUPPORT ON MOTION
FOR PARTIAL SUMMARY JUDGMENT AND MOTION FOR
PRELIMINARY INJUNCTION - 3

No. 2:23-cv-00017-MJP

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Snyder Dec - final

Final Audit Report

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